

W. Ashley Hess Direct (513) 455-7629 Fax (513) 762-7929 E-mail wah@gdm.com

June 21, 2005

JUN 2 2 2005

Via Federal Express

Commonwealth of Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

Re: An Assessment of Kentucky's Electric Generation, Transmission and Distribution Needs – Administrative Case Number 2005-00090

Dear Sir or Madam:

Please find the original and ten copies of the Motion to Withdraw of Greenebaum Doll & McDonald PLLC in the above-referenced proceeding. Any questions or comments should be directed to the undersigned.

Very truly yours,

W. Alley Hen

W. Ashley Hess

WAH/kao Enclosures

624767\_4

## COMMONWEALTH OF KENTUCKY



James 2 2005

In the Matter of:

AN ASSESSMENT OF	)	
KENTUCKY'S ELECTRIC	)	ADMINISTRATIVE CASE NO. 2005-00090
GENERATION, TRANSMISSION	)	
AND DISTRIBUTION NEEDS	)	

## MOTION TO WITHDRAW OF GREENEBAUM DOLL & MCDONALD PLLC

NOW COMES Greenebaum Doll & McDonald PLLC ("GDM"), counsel for Kentucky Pioneer Energy, LLC ("KPE") in the above-referenced proceeding, and hereby moves the Public Service Commission for permission to withdraw from the representation of KPE in the above-referenced proceeding.

GDM makes this request at a time when the Commission has received informational response and testimony at a Technical Conference held on June 14, 2005. There are no other expected filings in the proceeding and the Commission appears to be moving to an order summarizing its findings. This proceeding is an administrative case that is non-adversarial and involves no cross-examination of witnesses. In connection with the filing of the Motion to Withdraw by GDM, KPE has consented to such motion, and its rights do not appear to be jeopardized by a withdrawal by GDM.

For the reasons set forth above, the motion of GDM should be granted.

W. Ashley Hess

Greenebaum Doll & McDonald PLLC

255 E. Fifth Street, Suite 2800 Cincinnati, OH 45202-4728

(513) 455-7629 - phone

(513) 762-7929 – fax

wah@gdm.com

## Of Counsel:

Mark H. Longenecker, Jr.
Greenebaum Doll & McDonald PLLC
255 E. Fifth Street, Suite 2800
Cincinnati, OH 45202-4728
(513) 455-7618 – phone
(513) 762-7918 – fax
mhl@gdm.com

630198\_1

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this **21** day of **Suse**, 2005, upon:

Allen Anderson South Kentucky R.E.C.C. P.O. Box 910 925-929 N. Main Street Somerset, Kentucky 42502-0910

Mark A. Bailey Kenergy Corp. 3111 Fairview Drive P.O. Box 1389 Owensboro, KY 42302

Michael S. Beer VP- Rates & Regulatory Kentucky Utilities Company c/o Louisville Gas & Electric Co. P.O. Box 32010 Louisville, KY 40232-2010

Donald D. Blackburn Berea Municipal Utilities P.O. Box 926 Berea, KY 40403

Kent Blake Director-State Regulations and Rates Louisville Gas and Electric Company 220 W. Main Street Louisville, Kentucky 40232-2010

Honorable David F. Boehm Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 2110 Cincinnati, Ohio 45202 Sarah Botkin Business Service Manager Berea College Electric Utility Department CPO 2207 Berea, KY 40404

Dudley Bottom, Jr. Shelby Energy Cooperative, Inc. 620 Old Finchville Road Shelbyville, Kentucky 40065

Daniel W. Brewer Blue Grass Energy Cooperative Corp. P.O. Box 990 1201 Lexington Road Nicholasville, KY 40340-0990

Honorable David C. Brown, Esq. Attorney at Law Stites & Harbison, PLLC 1800 Ageon Center 400 West Market Street Louisville, KY 40202

Jackie B. Browning Farmers R.E.C.C. 504 South Broadway P.O. Box 1298 Glasgow, KY 42141-1298

Jackie B. Browning General Manager Farmers R.E.C.C. 504 South Broadway P.O. Box 1298 Glasgow, KY 42141-1298

Sharon K. Carson Finance & Accounting Manager Jackson Energy Cooperative P.O. Box 307 U.S. Highway 421S McKee, KY 40447 Gray Cassity Benton Electric System 436 Mayfield Road P.O. Box 10 Benton, KY 42025

Honorable Elizabeth L. Cocanougher Senior Corporate Attorney Louisville Gas and Electric Company 220 W. Main Street P.O. Box 32010 Louisville, KY 40232-2010

Michael H. Core President and CEO Big Rivers Electric Corporation 201 Third Street P.O. Box 24 Henderson, KY 42420

Larry R. Easterling Licking Valley R.E.C.C. P.O. Box 605 271 Main Street West Liberty, KY 41472

Paul G. Embs Clark Energy Cooperative, Inc. P.O. Box 748 2640 Ironworks Road Winchester, KY 40392-0748

Mr. David Estepp Manager of Finance & Administration Big Sandy R.E.C.C. 504 11<sup>th</sup> Street Paintsville, KY 41240-1422

Honorable John J. Finnigan, Jr. Senior Counsel The Union Light, Heat and Power Company 139 East Fourth Street Cincinnati, Ohio 45202 Carol H. Fraley President and CEO Grayson R.E.C.C. 109 Bagby Park Grayson, KY 41143

James B. Grainer Legal Division The Union Light, Heat and Power Company 139 East Fourth Street Cincinnati, Ohio 45202

Ted Hampton Cumberland Valley Electric, Inc. Highway 25E, P.O. Box 440 Gray, Kentucky 40734

Larry Hicks
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P.O. Box 609
Bardstown, KY 40004

Kerry K. Howard Manager, Finance and Administration Licking Valley R.E.C.C. P.O. Box 605 271 Main Street West Liberty, KY 41472

James J. Jacobus
President/CEO
Inter-County Energy Cooperative
Corporation
1009 Hustonville Road
P.O. Box 87
Danville, KY 40423-0087

Honorable Tyson A. Kamuf Attorney at Law Sullivan, Mountjoy, Stainback & Miller, PSC 100 St. Ann Street P.O. Box 727 Owensboro, KY 42302-0727

J. Daniel Kemp Attorney at Law Kemp, Ison, Harton, Tilley & Holland Tilley & Holland 612 South Main Street P.O. Box 648 Hopkinsonville, KY 42240

Honorable Michael L. Kurtz Attorney at Law Boeham, Kuntz & Lowry 36 East 7<sup>th</sup> Street, Suite 2110 Cincinnati, Ohio 45202

Honorable Charles A. Lile Senior Corporate Counsel East Kentucky Power Cooperative, Inc. 4775 Lexington Road P.O. Box 707 Winchester, KY 40392-0707

Robert M. Marshall Owen Electric Cooperative, Inc. 8205 Highway 127 North P.O. Box 400 Owenton, KY 40359

Elizabeth Marshall Attorney at Law Municipal Electric Power Association 110 A. Todd Street Frankfort, KY 40601

Thomas A. Martin, P.E. VP of Technical Services Warren RECC 951 Fairview Avenue P.O. Box 1118 Bowling Green, KY 42102-1118 Burns E. Mercer Meade County R.E.C.C. P.O. Box 489 Brandenburg, Kentucky 40108-0489

Shannon D. Messer System Engineer Clark Energy Cooperative, Inc. P.O. Box 748 2640 Ironworks Road Winchester, KY 40392-0748

Michael L. Miller President & CEO Nolin R.E.C.C. 411 King Road Elizabethtown, Kentucky 42701-8701

Honorable Brendon D. Miller Attorney Breathitt County Courthouse Office of Breathitt County Atty. 1137 Main Street Room 209 Jackson, KY 41339

Honorable James M. Miller Attorney at Law Sullivan, Mountjoy, Stainback & Miller, PSC 100 St. Ann Street P.O. Box 727 Owensboro, KY 42302-0727

Timothy C. Mosher American Electric Power 101A Enterprise Drive P.O. Box 5190 Frankfort, KY 40602

Barry L. Myers Manager Taylor County R.E.C.C. 100 West Main Street P.O. Box 100 Campbellsville, Kentucky 42719 G. Kelly Nuckols Jackson Purchase Energy Corporation 2900 Irvin Cobb Drive P.O. Box 4030 Paducah, KY 42003

Barry L. Myers Manager Taylor County R.E.C.C. 100 West Main Street P.O. Box 100 Campbellsville, Kentucky 42719

Anthony P. Overbey Fleming-Mason Energy Cooperative P.O. Box 328 Flemingsburg, KY 41041

Honorable Mark R. Overstreet Attorney at Law Stites & Harbison 421 West Main Street P.O. Box 634 Frankfort, KY 40602-0634

Roy M. Palk East Kentucky Power Cooperative, Inc. 4775 Lexington Road Winchester, Kentucky 40392-0707

Honorable Donald T. Prather Attorney at Law Mathis, Riggs & Prather, P.S.C. Attorneys at Law P.O. Box 1059 500 Main Street, Suite 5 Shelbyville, KY 40066-1059

Donald R. Schaefer Jackson Energy Cooperative P.O. Box 307 U.S. Highway 421S McKee, KY 40447 Honorable W. Jeffrey Scott Attorney at Law P.O. Box 608 311 West Main Street Grayson, KY 41143

Bobby D. Sexton President/General Manager Big Sandy R.E.C.C. 504 11<sup>th</sup> Street Paintsville, Kentucky 41240-1422

J. Donald Smothers Vice President Services Blue Grass Energy Cooperative Corp. P.O. Box 990 1201 Lexington Road Nicholasville, KY 40340-0990

Honorable David Edward Spenard Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Dr., Suite 200 Frankfort, Kentucky 40601-8204

John Wolfram Manager, Regulatory Policy/Strategy Louisville Gas and Electric Company 220 W. Main Street P.O. Box 32010 Louisville, KY 40232-2010

W. ASHLEY HESS

628951\_1